

Exhibit B

Proposed Production Requests

DOCUMENT REQUESTS DEFINITIONS

1. The singular form of a word includes the plural, and vice versa.
2. Any tense of a verb includes all tenses.
3. Any natural person includes that person's agents, assigns, attorneys, employees, representatives, and successors.
4. Any entity other than a natural person includes (a) that entity's present and former agents, affiliates (foreign or domestic), assigns, attorneys, consultants, directors, divisions, employees, officers, parents, predecessors, representatives, servants, subsidiaries, and successors; (b) any person or entity, directly or indirectly, wholly or in part, associated with, controlled by, or owned by that entity; and (c) and any other person or entity acting or purporting to act on behalf of (a) or (b).
5. "All," "any," and "each" mean any and all.
6. "And" and "or" are construed both conjunctively and disjunctively.
7. "Associated with" includes, but is not limited to, "affiliated with," "corresponding to," "owned by," "controlled by," and "operated by."
8. "CEL Token" means the ERC-20 token deployed on the Ethereum blockchain identified as CEL.
9. "Document(s)" has the meaning afforded to it by Local District Rule 26.3, made applicable to this matter by Local Bankruptcy Rule 7026-1.
10. "FTX Debtors" means entities that have filed voluntary petitions under chapter 11 of title 11 of the United States Code in the jointly-administered cases styled *In re: FTX TRADING LTD.*, et al., No. 22-11068 (Bankr. D. Del.), a list of which can be found under "List of Debtors" at <https://restructuring.ra.kroll.com/FTX/Home-Index>.

11. “FTX Exchange” means the digital asset exchange(s) and related digital asset trading platform(s) founded by Sam Bankman-Fried, Gary Wang, and Nishad Singh and operated by the FTX Debtors and certain of their non-debtor affiliates.

12. “FTX User Account” means a user account registered with the FTX Exchange.

13. “Futures Contract” means an agreement to buy or sell a digital asset available to transact in on FTX Exchange in the future at a predetermined price.

14. “Identify” has the meaning afforded to it by Local District Rule 26.3, made applicable to this matter by Local Bankruptcy Rule 7026-1.

15. “Including” means including but not limited to.

16. “Know Your Customer Information” means information provided to the FTX Exchange when an FTX User Account is registered, information provided to the FTX Exchange on an ongoing basis about the individual or entity to whom the FTX User Account is registered, information obtained by the FTX Exchange from third parties about the individual or entity to whom the FTX User Account is registered, and information provided to the FTX Exchange about the individual or entity to whom the FTX User Account is registered through any other diligence efforts.

17. “FTX Address” means a blockchain address associated with an FTX User Account.

18. “Identified FTX Addresses” means the following FTX Addresses, and, for the avoidance of doubt, each is an “Identified FTX Address”:

- a. 0xd84c82dcfb21572b68339f14453bfe39fdc81f74
- b. 0x2be52c6e141a314778b5ea702e8a9dc87b42d126
- c. 0xe78f531e2904fd35cb1429f3d72e9dcddaaeb87a
- d. 0x44f73a35b995c7a55864209468925bf450cf0a00
- e. 0x1785904b28ad668b4778618f749db6b4a04472ed

- f. 0xd7cf4d9176519142bf64111d713d3f85cdff1b67
- g. 0x35065ff705bf0dd0d1f5a99a9df85dc5dd40f046
- h. 0xb4e872704625ea0f69f95c856ad49aff44da2ba4
- i. 0x9ae84342a3cf5587dd9110a461f2f4813cd98a15
- j. 0x6ba3f5617cd50c36b118bf94ab5c33e03686ad49

19. “You” and “Your” means and refers to any or all the FTX Debtors.

INSTRUCTIONS

The preceding Definitions apply to each of these Instructions and for purposes of these Requests, the following Instructions shall be followed:

- 1. These Requests seek production of material in Your possession, custody, or control.
- 2. These Requests seek production of nonprivileged material.
- 3. For each Request, either state that You will produce the requested material or state with specificity the grounds for objecting to the Request, including the reasons.
- 4. If You object to all or part of a Request, state whether You are withholding any responsive material based on that objection.
- 5. If You object to part of a Request, specify the part and state that You will produce documents responsive to the rest.
- 6. If You withhold responsive information by claiming that the information is privileged or subject to protection as trial-preparation material, expressly make the claim and describe the nature of the information privileged or protected in a manner that, without revealing information itself privileged or protected, will enable Plaintiffs to assess the claim. For each Document You withhold as privileged, provide in writing (a) the type of document (e.g., letter or memorandum); (b) the general subject matter of the Document; (c) the date of the document; (d) the author,

addresses, and any other recipients of the Document; (e) where not apparent, the relationships of the author, addressees, and recipients to each other; (f) the nature of the privilege being claimed.

7. If after responding to any Request You learn that Your response is in some material respect incomplete or incorrect, supplement or correct Your response in a timely manner.

RELEVANT TIME PERIOD

Unless otherwise specified, these Requests cover the time period from and including May 1, 2019 through the present.

REQUESTS

1. Documents sufficient to identify the FTX User Account(s) associated with each Identified FTX Address.

2. Documents sufficient to identify the entity or individual associated with each FTX User Account identified in response to Request No. 1, including all Know Your Customer Information for each such entity or individual.

3. Documents sufficient to identify all FTX User Account(s) associated with any entity or individual identified in response to Request No. 2, other than FTX User Accounts identified in response to Request No. 1.

4. Documents sufficient to identify all FTX Address(es) associated with each FTX User Account identified in response to Request No. 1 and Request No. 3, other than the Identified FTX Addresses.

5. Documents sufficient to show when each FTX User Account identified in response to Request No. 1 and Request No. 3 was created and, where applicable, closed.

6. Documents sufficient to show a complete transaction history for each FTX User Account identified in response to Request No. 1 and Request No. 3.

7. Documents sufficient to show all short positions with respect to the CEL Token on an FTX Exchange from April 1, 2022 to August 30, 2022.

8. Documents sufficient to identify the FTX Address(es) associated with each short position identified in response to Request No. 7.

9. Documents sufficient to identify the FTX User Account(s) associated with each FTX Address identified in response to Request No. 8.

10. Documents sufficient to identify the entity or individual associated with each FTX User Account relating to Request No. 8, including all Know Your Customer Information for each such entity or individual.

11. Documents sufficient to show all borrow or loan transactions associated with the positions identified in response to Request No. 7.